

### REMARKS

In the current Office action, the claims were rejected as follow:

(1) Claims 1-6 and 14-26 were rejected as unpatentable over U.S. Patent No. 6,311,165 (Coutts) in view of U.S. Published Patent Application No. 2001/0011680 (Soltesz et al.).

(2) Claims 7-13 were rejected as unpatentable over the Coutts patent in view of U.S. Patent No. 6,318,536 (Korman).

The listing of claims above is consistent with the amendments and listing of claims presented in applicant's amendment in response to the final Office action of May 5, 2005. In that amendment, claim 7 was amended to include the features of claim 26, which was canceled. Applicant respectfully requests entry of those amendments.

In view of the following remarks, applicant respectfully requests reconsideration and withdrawal of the rejections of the claims.

Independent claim 1 recites a value transaction system including transaction units and a controller that is operable to *upload* run-time interpreted code units *from the transaction units*. The controller can execute the code of each respective code unit and generate signals to control the operation of the respective transaction units. Independent claims 7, 14, 22 and 25 recite similar features.

Such an arrangement may provide the advantage that a new unit of completely arbitrary type can be added to an existing transaction system and function correctly with the other units under the control of a central controller in which the software units are integrated to facilitate information exchange. That may be accomplished without requiring either (a) an on-line system with a central, remote software-storing server or (b) a system that incorporates high-powered "intelligent" transaction units (*see, e.g.,* Specification, page 2, line 21 - page 3, line 6).

The Coutts patent relates to networked transaction systems having a central server and a terminal having a number of peripheral devices, such as a cash dispenser, card reader, etc. The systems disclosed by the Coutts patent have peripheral devices that download software from the central server and execute their own software. For example, the Coutts patent discloses:

[T]he server is arranged to store applications and driver or other operational software for the peripheral devices and communication links can be provided from the server to individual peripheral devices to enable such software to be *downloaded from the server to the device.*

\* \* \*

With the disclosed architecture, appropriate software can be readily *downloaded from server 16* through link 17 at run time without the need to store every alternative driver program at the dispenser.

(Col. 3, lines 58-62; col. 11, lines 6-9) (Emphasis added) Thus, the peripheral devices retrieve software from a source (*i.e.*, the server) that is external to the transaction system itself. As explained by the Coutts et al. patent, such implementations “allow for the *remote* administration of an entire transaction network” (col. 9, lines 51-52).

Indeed, the Office action acknowledges (at pages 2-3) that the Coutts patent “does not disclose the controller being operable to upload from the transaction units respective run-time interpreted code units for storing in the memory or separately loading executable code for the respective code modules from the associated transaction unit into the memory means of the controller.”

Nevertheless, the Office action cites the Soltesz et al. patent as allegedly disclosing those features. In particular, the Office action refers to paragraphs 3 and 34 of the Soltesz et al. patent.

The Soltesz et al. patent discloses a self-service kiosk. Paragraphs 3 and 34 of the Soltesz et al. patent disclose connecting the kiosk to the Internet, for example “for downloading or uploading new programs.” There is no indication, however, that the retrieved software is used for controlling the operations of respective transaction units within the kiosk. Moreover, the software is not retrieved from the transaction units.

Thus, the Coutts et al. patent merely discloses retrieval of code from a source external to the transaction system in the form of a central server. The Soltesz et al. patent also suggests retrieval of code from an external source (*i.e.*, the Internet). Accordingly, the cited references neither individually nor in combination suggest the retrieval of code units from respective transaction units.

Although not mentioned by the Office action, the Soltesz et al. patent also suggests (in paragraphs 23, 36 and 44) the possibility of storing software in a portable biometric data storage card. Processing responsibilities may be shared between the kiosk and the processor on the card (*see, e.g.*, paragraph 36).

However, the data storage card does not constitute a “transaction unit” forming part of a “transaction system” as recited in claim 1 and, even if it did, there is no suggestion of a controller which uploads that software and executes it in order to control the operation of the data storage card. Therefore, there is no disclosure or suggestion of a controller “operable to upload from said transaction units respective run-time interpreted code units . . . , the controller being operable to execute the code of each respective code unit and in response thereto to generate signals controlling the operation of the respective transaction units,” as recited in claim 1.

At least for those reasons, claim 1 and dependent claims 2-6 should be allowed.

Independent claims 14 and 25, as well as their dependent claims, should be allowed for similar reasons.

Claims 7-13 should be considered allowable at least for reasons similar to those discussed above. Furthermore, the Office action does not even address the fact that independent claim 7


specifically recites uploading a Java application from the further transaction unit. That feature, as well as the subject matter of claim 7 as a whole, is not suggested by the combination of the Coutts et al. and Korman et al. patents.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

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Respectfully submitted,

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